

January 9, 1998

Dear Sir or Madam:

I am writing to inform you of amendments to California's consumer product regulations that became effective on November 18, 1997. The amendments pertain to exempting perchloroethylene (tetrachloroethylene or perc) from the volatile organic compound (VOC) definition and the reporting requirements added to allow Air Resources Board (ARB/Board) staff to monitor perc usage in consumer products. These amendments are incorporated into both the consumer products regulation (Title 17, California Code of Regulations (CCR), sections 94507-94517) and the aerosol coatings regulation (Title 17, CCR, sections 94520-94528).

Perc Reporting Requirements for Phase I and II Consumer Products

The perc reporting requirements for products subject to the Phase I or II VOC limits are contained in section 94513(e) of the consumer products regulation. Responsible parties are required to provide information on each product that contains 1.0 percent or more by weight of perc. For your convenience, section 94513(e) is provided for you as Enclosure A to this letter.

Three separate reporting requirements are now due:

- Data for the 1996 calendar year to establish baseline perc usage (see section 94513(e)(2));
- Reporting requirements for new products containing perc introduced in 1997 (see section 94513(e)(3)); and
- Data for the 1997 calendar year to update baseline perc usage and California sales for your products (see section 94513(e)(4)).

For your convenience we have included reporting forms and instructions as Enclosure B. These forms can be used to provide all three of the required reports. Please use separate forms for each reporting requirement and clearly indicate which data you are recording on each form by checking the appropriate box. All of these reporting requirements are due on March 1, 1998.

Perc Reporting Requirements for Aerosol Coating Products

Manufacturers of aerosol coatings are also subject to perc reporting requirements [see section 94524(e) of Title 17, CCR (Enclosure C)]. However, we recently sent aerosol coating manufacturers a survey for reporting their sales and formulation data for 1997. To avoid duplication, we will review

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these data regarding perc usage first. Based on these data we will follow up with manufacturers to receive 1996 baseline data as necessary.

As always, all information which you designate as confidential will be handled strictly in accordance with ARB confidentiality regulations. To ensure that information deemed confidential is clearly identified, we have provided a space on the Company Information Form (part of Enclosure B) for you to indicate that your report contains confidential information.

Thank you in advance for your assistance in providing us this information. If you have any questions about this request or the reporting forms, please contact Ms. Carla Takemoto, Manager, Technical Evaluation Section, at (916) 322-8283.

Sincerely,

Donald J. Ames
Assistant Chief
Stationary Source Division

Enclosures

cc: Ms. Carla Takemoto, Manager
Technical Evaluation Section
Air Quality Measures Branch
Stationary Source Division